



## 7. Appendices

- A. Finding of No Significant Impact
- B. Response to Comments
- C. Best Management Practices
- D. Cumulative Project List

## **APPENDIX A. FINDING OF NO SIGNIFICANT IMPACT - PRESIDIO TRAILS AND BIKEWAYS MASTER PLAN AND ENVIRONMENTAL ASSESSMENT**

### ***Purpose***

This Finding of No Significant Impact (FONSI) provides the basis for the National Park Service's (NPS) and the Presidio Trust's (Trust) determination that the Selected Action (Alternative B or the Preferred Alternative as modified in response to public comments), as analyzed in the integrated Presidio Trails and Bikeways Master Plan and Environmental Assessment (Trails Plan/EA or plan), will not have a significant effect on the human environment and does not require the preparation of an Environmental Impact Statement. A complete description of the Selected Action and its environmental consequences are contained in the Trails Plan/EA, which is attached and incorporated by reference into this FONSI.

The Trails Plan/EA was developed to provide park visitors and Presidio residents and tenants with a comprehensive and enjoyable trails and bikeways system, while protecting and enhancing the Presidio's natural and cultural resources. A coherent network of trails is needed to enhance connections among key features of the Presidio, and to create an organized, accessible, safe and managed means for the public to explore and experience the Presidio's open spaces. The Trails Plan/EA will guide management and stewardship of the Presidio trails and bikeways network for the next 20 years. The Trails Plan/EA is a joint effort of NPS and the Trust, the two agencies responsible for management of the Presidio, and many members of the community who have played a role in the planning process. The Trails Plan/EA has been republished in its entirety to include changes made in response to public comments received on the November 2002 document.

### ***Selected Action***

The Trails Plan/EA analyzed four alternatives that differed primarily in the mix of different trail types, and the different types of visitor experiences each mix will create:

- Alternative A, the No Action Alternative, maintains the Presidio's current trails and bikeways network and assumes that no comprehensive changes or major new trail construction will take place.
- Alternative B, the Mixed Use Alternative (Preferred Alternative in the Trails Plan/EA), provides the widest range of educational and recreational opportunities for the broadest range of park users. This alternative offers a mix of urban and natural visitor experiences to emphasize both traditional uses of the Presidio and the park's unique location in a large metropolitan area.

- Alternative C, the Shared Use Alternative, provides the greatest number of multi-use trails that access major points of interest in the Presidio. This alternative accommodates large numbers of park users but with fewer opportunities for solitude.
- Alternative D, the Dispersed Use Alternative, focuses on single use trails, and provides fewer opportunities for accessible trails and off-street recreational cycling.

NPS and Trust developed the alternatives based on the plan's purpose and need, issues raised in scoping and other public comment. The Trails Plan/EA disclosed the potential environmental consequences that may result from implementation of each alternative. Based on the assessment of potential effects, consideration of public and agency comment, and the entire administrative record, the modified Alternative B is designated as the NPS' and the Trust's Selected Action. This alternative includes the following:

## **Trails and Bikeways**

Implementation of the Selected Action will include both improvements to existing trails and bikeways and the development of new trail and bikeway corridors at the Presidio. Three basic trail types will be provided: pedestrian trails, multi-use trails and bikeways. Pedestrian trails will be separated from bike and auto traffic, offering users the opportunity to experience the Presidio without distractions from other types of trail users. Multi-use trails will offer safe, enjoyable opportunities for pedestrians, slower-speed recreational or family bicyclists, and other wheeled sports users to travel through the Presidio. Several different types of bikeways will be included, depending on the intended bicycle user, roadway constraints and vehicle traffic volumes. Safety upgrades will be made on trails and bikeways throughout the Presidio and at intersections and roadway crossings. Connections to city and regional bike routes will be improved. Specific trails and bikeways improvements will include:

- **Coastal Trail.** Improvements will be made to an existing 3-mile trail and bike route traversing the coastal bluffs.
- **Batteries and Bluffs Corridor.** A new trail corridor will provide safe access to historic gun batteries and the shore, replacing "social" trails that are causing severe erosion.
- **Bay Area Ridge Trail.** Improvements will be made to an existing 2.5-mile multi-use segment of the Bay Area Ridge Trail, connecting the Arguello Gate to the Golden Gate Bridge.
- **Baker Beach and Lobos Creek Valley Loop.** New and existing trail corridors will provide a 2-mile loop, including the Lobos Creek Valley boardwalk, remnant native sand dunes and Baker Beach.
- **Park Boulevard.** A major new north-south connector will travel from Mountain Lake, through the Presidio Golf Course, over forested Presidio ridgetops, and through the historic Cavalry Stables to Crissy Field.

- **Ecology Trail.** Improved accessibility will be provided along the existing 2-mile loop trail from the top of the Main Post to Inspiration Point, with its serpentine grassland and dramatic overlook.
- **West Pacific/Mountain Lake Corridor.** Improvements to existing trails will create a mixed-use corridor paralleling the Presidio's southern boundary, connecting the Broadway Gate, Julius Kahn Playground, the Presidio Golf Course, Mountain Lake, and the Lobos Creek Valley.
- **Tennessee Hollow Corridor.** A new trail through the restored Tennessee Hollow stream corridor will connect Julius Kahn Playground to Crissy Field.
- **Lover's Lane.** One of the oldest foot trails in the Presidio, Lover's Lane will be revitalized to improve pedestrian access and create a new parallel bikeway on Presidio Boulevard.
- **Presidio Promenade.** Improvements to the Lincoln Boulevard corridor will create a new continuous trail from the east edge of the Presidio, through the historic Main Post, to the Golden Gate Bridge and the Coastal Trail.
- **Golden Gate Promenade.** Improvements will be made at the west end of the existing 4-mile trail providing access to Crissy Field, Fort Point and the Golden Gate Bridge. This trail is part of the regional San Francisco Bay Trail.

## **Trailheads and Scenic Overlooks**

A comprehensive system of new and improved scenic overlooks will be included in the Selected Action. Scenic overlooks will be strategically sited to take advantage of the Presidio's spectacular views. Trailheads will improve connections between trail corridors and bikeways, roadways, parking and major points of interest in the park.

## **Resource Protection**

New trails and bikeways will help visitors enjoy the Presidio and prevent damage to sensitive habitats and irreplaceable cultural resources. Networks of undesignated social trails will be replaced with new sustainable trails, reducing impacts and improving visitor mobility. Interpretive trails will introduce users to the Presidio's rich history and ecology.

## ***Rationale for Not Selecting Other Alternatives***

The other alternatives were not chosen as the Selected Action for the following reasons:

- Alternative A, the No Action Alternative, provided few beneficial effects or improvements and would not correct existing trail network deficiencies. This alternative would avoid construction effects, but would not attain the widest range of beneficial uses identified in Chapter 5 of the Trails Plan/EA and would not enhance visitor use and experience.

- Alternative C, the Shared Use Alternative, has the highest potential to degrade the Presidio's environmental resources. Although this alternative would actively promote bicycles as a transportation alternative and, therefore, best contribute to a comprehensive transportation strategy, it would also require the most significant modifications to road corridors by adding the most linear miles of multi-use trails. Thus, the balance between resource protection and the promotion of bicycle transportation was considered less favorable in this than the Selected Action.
- Alternative D, the Dispersed Alternative, was rejected because it failed to provide as cohesive and comprehensive a trail system as the other alternatives. Although it would provide the greatest variety of experience and physical challenge for pedestrians, this alternative would not provide for consistent and continuous trail connections for multiple user groups and therefore would not encourage a reduction in automobile use to, from and within the Presidio.

### ***Modifications to the Preferred Alternative***

In responding to specific suggestions from the public comments, the NPS and Trust made several changes to the Trails Plan/EA, including modifications to the Preferred Alternative as evaluated in the Trails Plan/EA. These changes are summarized below and explained further within the responses to comments included in Appendix B of the republished Trails Plan/EA. None of the modifications to the Preferred Alternative raise any environmental concerns or impacts that have not been previously examined in Chapter 5 of the November 2002 Trails Plan/EA.

### **User Conflicts**

In response to requests for greater separation of pedestrians and bicyclists, the number of multi-use trails decreased slightly, and in some cases the locations were modified. For example, the trail immediately adjacent to West Pacific Avenue is now proposed as a pedestrian trail, and the parallel trail through the Pacific Grove and below Julius Kahn Playground is proposed as a multi-use connection. The change is intended to reduce the potential for conflicts between bicyclists on the multi-use trail and users of the playground.

### **Pedestrian Access**

In response to suggestions to provide more pedestrian-only trail experiences and to retain more of the existing social trails, the Trails Plan/EA clarifies that the majority of social trails will be retained, in most cases as secondary pedestrian trails, except where the trails would have an adverse effect on overriding resource values. To this end, the Preferred Alternative now converts more social trails to designated trails, including the trail leading from Battery Marcus Miller to North Baker Beach, and a connection from the Washington Boulevard overlook to Lincoln Avenue. In addition, in response to comments requesting smaller, narrower multi-use trails, the width of multi-use trails within the Preferred Alternative could be reduced from between 8 feet (2.4 meters) and 10 feet (3.0 meters) to 6 feet (1.8 meters) to permit a more intimate visitor experience where appropriate.

## **Off-Road Mountain Biking**

In response to comments supporting off-road mountain biking, the Trails Plan/EA clarifies that access for off-road mountain biking is provided through the multi-use trails within the park. In addition, a new multi-use trail has been included, connecting the Broadway Gate via Pacific Grove to Arguello Boulevard and the Bay Area Ridge Trail. As several commentors indicated, this trail provides an off-road connection through the Presidio from the southeast corner of the park to the Golden Gate Bridge. The trail can also be used with other multi-use trails and bike lanes to create loops throughout the park. Due to potential unacceptable impacts on park resources and values, an unpaved, single-track mountain bike experience is not being considered as requested.

## **Dog Walking and Off-Leash Recreation**

In response to commentors' suggestions, the Trails Plan/EA now acknowledges that on-leash dog walking is a popular form of pedestrian use of trails in the park, and clarifies that Presidio visitors with dogs on leash are allowed on all pedestrian and multi-use paths. The Trails Plan/EA also refers to the ongoing rulemaking process to develop an alternative pet management regulation for off-leash dog walking within the Presidio and the GGNRA as a whole. No decision regarding off-leash dog walking within the park will be made until the rulemaking process is completed.

## **Signage**

In response to commentors' requests to improve signage, the Trails Plan/EA now provides specific information that may be included on trailhead signs and guides. Clear and concise roadway and trail signage will identify trails and bikeways, guide users to their destinations, and inform motorists of the presence of bicyclists and pedestrians. The number and type of signs will not, however, be so pervasive as to create "sign clutter" and detract from the park setting. The Presidio Trust and NPS will continue to incorporate traffic calming into plans for roadway and intersection improvements within their separate jurisdictions.

## **Specific Trail Modifications**

The following changes (shown in Figure 1) have been made to the Preferred Alternative to incorporate suggestions offered during public comment:

- **Coastal Trail.** A pedestrian connection from Battery Crosby, across to the sand ladder, then down and across Baker Beach has been added. This will create a pedestrian corridor connecting the Golden Gate Bridge to the 25th Avenue Gate. The multi-use trail adjacent to Lincoln Boulevard and bike lanes on both sides of Lincoln Boulevard has been retained.
- **Bay Area Ridge Trail.** The Bay Area Ridge Trail now crosses Washington Boulevard farther to the west, and includes a new multi-use segment adjacent to Washington Boulevard, connecting to Nauman Road and Amatory Loop. A new pedestrian crossing at Park Boulevard, as well as a

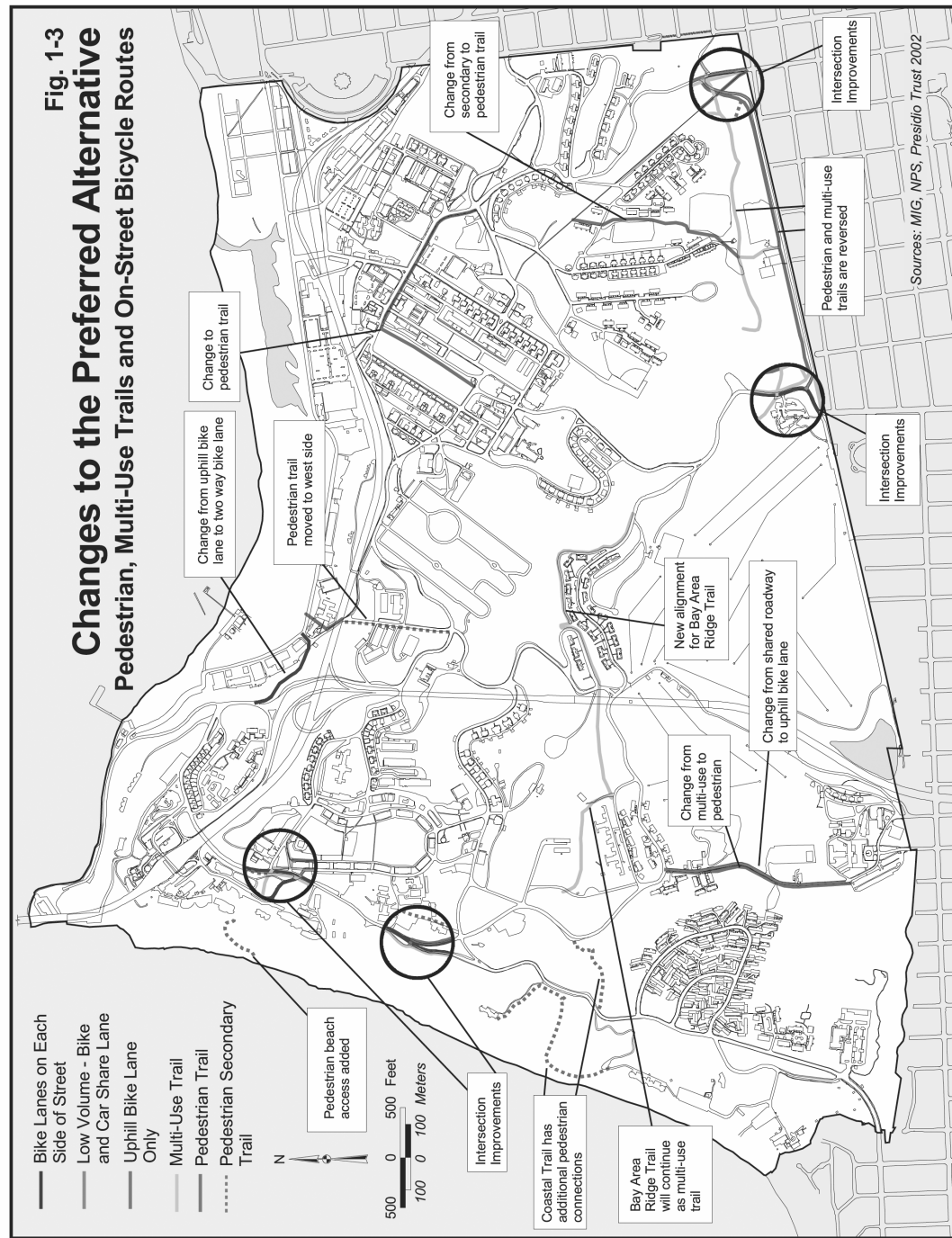


Figure 1-3. Changes to the Preferred Alternative, Pedestrian, Multi-Use Trails and On-Street Bicycle Routes

new trail connection in the forest from Park Boulevard to Battery McKinnon-Stotsenberg is also being provided. The Bay Area Ridge Trail segment through the Rob Hill Campground will now continue as a multi-use trail, and a new pedestrian spur has been added from north of Building 1347 to the east of Building 1202 in Fort Scott. The trail alignment has been changed to connect the Harrison Boulevard/Kobbe Avenue intersection to Ralston Avenue, rather than using Greenough Avenue, skirting Building 1340. The Kobbe Avenue/Merchant Road intersection will also be improved.

- **Park Boulevard Trail.** The Park Boulevard/ Washington Boulevard intersection has been modified to create a better crossing. The sidewalk is now proposed on the west side of McDowell Avenue rather than the east side, and a new pedestrian connection to Crissy Field between Stilwell Hall and Building 649 has been added.
- **Ecology Trail.** The connection from Quarry Road onto Arguello Boulevard has been improved for both wheelchair users traveling to Inspiration Point, and for users who wish to cross to the Presidio Golf Course.
- **West Pacific/Mountain Lake Corridor.** Both a pedestrian and a multi-use corridor will be provided in this heavy use location to reduce user conflicts. The locations of the multi-use trail and the pedestrian trail through Pacific Grove and Julius Kahn Playground have been changed so that the pedestrian trail will be adjacent to the road and the multi-use trail will cut through the grove north of the playground.
- **Tennessee Hollow Trail.** A pedestrian trail will be located within the eastern tributary as part of the Tennessee Hollow trail corridor.
- **Lover's Lane.** The intersection of Lover's Lane and West Pacific Avenue will be modified to improve the spur to the Broadway Gate.
- **Presidio Promenade.** A consistent sidewalk route and bike lanes will be provided within this corridor, but not a continuous multi-use trail. The bike lanes will separate near the Cavalry Stables, using Patten Road for the westbound bike lane, and Lincoln Boulevard for the eastbound bike lane. Crissy Field Avenue will serve as a two-way multi-use path with no automobile traffic, subject to further Trust review and approval.
- **Wedemeyer Street/Battery Caulfield Road.** The connection from the 15th Avenue Gate to Washington Boulevard will include both an uphill bicycle lane and a pedestrian path (sidewalk) rather than a multi-use path to reduce user conflicts.

### ***Environmentally Preferable Alternative***

The environmentally preferable alternative is the alternative that best promotes NEPA's goals. Although each alternative does so with a different balance among values, all of the Action Alternatives would enhance visitor use and experience, support resource management, contribute to a comprehensive transportation strategy, encourage sustainable design and construction, and promote stewardship. The Selected Action is, however, the environmentally preferable alternative



because it best enhances visitor use and experience by providing diverse recreational and educational experiences, minimizing user conflicts, improving connections to regional trails, and ensuring access to the Presidio's outstanding natural and cultural resources. The Selected Action provides this wide range of beneficial uses without degradation of the physical environment, risk to health or safety, or other undesirable or unintended consequences.

### ***Basis for Decision***

Based upon the Trails Plan/EA and the entire agency record, NPS and the Trust determined that the Selected Action will not have direct, indirect or cumulative significant impacts on the human environment. The detailed analysis supporting this conclusion is in Chapter 5 of the Trails Plan/EA. NPS and the Trust will impose Best Management Practices (BMPs) such as those identified in Appendix C as specific conditions during the design of individual trails projects implementing the Selected Action. The following summarizes factors considered in this determination.

### **Geologic Resources**

Trails and bikeways improvements will not increase the likelihood or intensity of seismic activity at the Presidio or the risk of other geologic hazards, such as settlement or land sliding. Potential soil erosion impacts will be offset by required compliance with the BMPs included in the Trails Plan/EA and project Standard Conditions.

### **Hydrologic Resources**

New and rehabilitated trails will avoid hydrologic features, such as sensitive areas surrounding creeks, springs, seeps and water bodies, and will be designed to reduce erosion and therefore reduce the likelihood of sedimentation and water quality impacts.

### **Biological Resources**

Trail routes will be aligned or redesigned to manage human access and bypass sensitive habitat areas, and designed to the extent practicable to limit habitat effects, improve habitat values, and promote wildlife movement. Minimization and compensatory measures included both in the final Biological Opinion and the BMPs in the Trails Plan/EA will be incorporated into individual trails projects to minimize effects on biological resources.

### **Cultural Resources**

Trail alignments will occur primarily in previously disturbed areas such as within existing road prisms and along social trails to avoid disturbing historic fabric (e.g., historic curbs and retaining walls), removing trees within the cultural landscape or altering character-defining features of the historic forest. All ground-disturbing construction activities will be subject to archaeological monitoring in accordance with NPS' GGNRA Programmatic Agreement or the Presidio Trust Programmatic

Agreement Stipulation XIII and the Presidio Archaeological Monitoring Protocols (whichever is applicable at the time of monitoring).

## **Traffic Safety**

Any narrowing of traffic lanes on park roadways to provide for bicycle and pedestrian use may result in a small reduction in travel speed for vehicles and associated vehicle capacity. This impact is considered minor because changes in capacity will not be sufficient to substantially increase congestion. Reductions in lane width or design exceptions will be granted after careful study by qualified traffic engineers to determine that proposed projects will result in an improvement over existing conditions for pedestrians, bicyclists or automobile traffic in terms of access, capacity or safety.

## **Visitor Use**

Proposed improvements will substantially enhance the visitor experience. Although construction activities may temporarily detract from the natural setting of the park and somewhat limit access within the Presidio, development of new trail alignments will occur gradually in phases, so that construction-related impacts will be localized as well as temporary, thus lessening any short-term effect.

## **Visual Resources**

The increase in linear miles of trails could expand the visible presence of improvements at the Presidio. The potential impact may be somewhat detectable from regional vistas, but is not expected to have a significant effect on visual resources due to the extensive vegetative cover of the Presidio and the low-profile nature of trails. In addition, some of the new trails will replace the deleterious impact of inappropriately placed social trails, and in other cases, pedestrian trails or service roads will be converted to more accessible multi-use trails. All new trails will be designed and constructed to visually blend with the existing surroundings to the maximum extent feasible, and to provide access to the Presidio's remarkable scenic vistas.

## **Air Quality**

Construction of new and regraded trails may generate dust from "fugitive" sources, which could have minor, temporary effects on air quality within the park. As appropriate, construction contractors will implement the Bay Area Air Quality Management District's recommended control measures incorporated as BMPs into the Trails Plan/EA to reduce fugitive dust emissions and minimize any effects.

## **Noise**

Construction activities associated with trail modifications could result in a temporary increase in noise levels within the park vicinity. Contractors will comply with all applicable regulations of the San Francisco Noise Ordinance to minimize construction-related noise impacts.

## **Cumulative Impacts**

Overall, the incremental impacts associated with trails and bikeways improvements will be short-term or negligible and are not expected to result in cumulative effects that are significant. In many instances, even when combined with other past, present or future projects, the incremental contribution of the Selected Action to the cumulative effect on the Presidio will be beneficial.

## ***Non-Impairment of Park Resources***

Pursuant to the 1916 Organic Act, NPS has a management responsibility "to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations." Therefore, NPS cannot take an action that would "impair" park resources within the meaning of the organic statute.

According to NPS guidance, impairment is an impact that, in the professional judgment of the responsible NPS manager, would harm the integrity of park resources or values, including opportunities that otherwise would be present for the enjoyment of those resources or values. An impact would be less likely to constitute an impairment to the extent that it is an unavoidable result from an action necessary to preserve or restore the integrity of park resources or values. An impact would be more likely to constitute impairment if it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- Key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; and
- Identified as a goal in the park's General Management Plan or other relevant NPS planning documents.

Impairment of park resources is evaluated based on the type and intensity of impact and in terms of the types of resources affected. In general, beneficial impacts do not constitute impairment. With respect to the intensity of impacts, negligible and minor adverse impacts are not of sufficient magnitude to constitute impairment. Moderate and major adverse impacts may constitute impairment but do not automatically cause it. Rather, these impacts must be analyzed with respect to the three criteria listed above.

An analysis concerning impairment of park resources in Area A of the Presidio is provided at the end of each resource topic in Chapter 5 of the Trails Plan/EA. The analyses conclude that implementation of the Selected Action will only have minor adverse impacts to park resources or values. Taken as a whole, the Selected Action will improve the long-term health of resources key to the natural and cultural integrity of the park and will increase opportunities for public enjoyment of the park. Consequently, implementation of the Selected Action will not constitute or result in impairment of park resources as provided under NPS' 1916 Organic Act.

## **Public Involvement**

### **Scoping**

The Trust and NPS invited and encouraged public scoping comments between October 1999 and June 2000 to identify issues and develop goals and objectives for the Trails Plan/EA. The scoping process included two public meetings, a series of focus group meetings, a design concept workshop, a survey of park users, and various opportunities for written comment. Key issues that emerged from public scoping have been considered and addressed in the Trails Plan/EA or responded to in the Response to Comments in Appendix B. Major scoping issues included the following:

- Preserve and protect park resources
- Maintain and enhance the Presidio's wilderness feel
- Emphasize trail and park interpretation
- Improve trail signage and park wayfinding
- Develop a hierarchy of connected trails with permitted uses for each, i.e., restrict bicycles to certain trails
- Improve on-street bicycle connections with striped and, where possible, separated bicycle lanes
- Enhance park amenities, e.g. , provide more garbage cans, improve lighting at trailheads, construct restroom facilities
- Calm park traffic and consider limited street closures, e.g., weekend closures
- Provide additional parking at major trailheads
- Enforce existing and new park regulations
- Increase the number of designated off-street bicycle trails
- Develop sanctioned off-leash dog areas

### **Trails Plan/EA**

Prior to being made available to the public, the Trails Plan/EA was featured in a cover article in the September 2002 edition of the Presidio Post, the Trust's monthly newsletter with a distribution of

more than 14,000 individuals, organizations and agencies that are interested in activities at the Presidio. The article provided information on the Trails Plan/EA planning and environmental review process, issues identified through the public scoping process and addressed in the document, goals and proposed improvements, and public involvement opportunities. The Trails Plan/EA was presented at a public meeting held at the GGNRA Citizens' Advisory Commission on October 22, 2002. In addition, three plan-related walks and bike rides were offered on October 26, November 1 and November 2, 2002 for the public to learn more about proposed trails and bikeways improvements.

At the time of release of the Trails Plan/EA on November 14, 2002, approximately 1,500 copies of its Executive Summary were distributed to Presidio tenants and residents, local neighborhood organizations and groups, and project neighbors. The Executive Summary provided an overview and key elements of the Trails Plan/EA, and information on the NEPA review process. Approximately 150 copies of the Trails Plan/EA were distributed to city, state and federal government agencies, public interest groups, neighbors and various individuals. Both the Executive Summary and the Trails Plan/EA were also available for review and accessible for download on the NPS' and Trust's websites ([www.nps.gov/goga](http://www.nps.gov/goga) and [www.presidiotrust.gov](http://www.presidiotrust.gov)). The public was invited to provide oral comment on the Trails Plan/EA at a joint GGNRA and Presidio Trust public meeting held at the GGNRA Park Headquarters on January 28, 2003, during which members of the public were also encouraged to submit written comments. Staffed tables were also set up at Crissy Field on February 2 and February 9, 2003 to distribute information and help the public understand the Trails Plan/EA. The 90-day public review period ended on February 12, 2003.

## **Public Comments**

By the close of or shortly after the expiration of the public review period, NPS and the Trust had received a total of 100 written comment letters, faxes and emails on the Trails Plan/EA. In addition, oral comments were provided by 27 individuals at the January 28, 2003 public meeting. Fourteen of those individuals submitted written comment letters. The names of agencies, organizations and individuals commenting on the Trails Plan/EA, and summary responses to comments are provided in Appendix B of the republished Trails Plan/EA. Copies of all written comments and the transcript of the public meeting are available for review in the Trust's library.

In general, key issues raised by the public included:

- A desire for greater separation between pedestrians and bicycles on the more popular trails to avoid user conflicts
- A desire to retain as many existing trails as possible as secondary pedestrian access to enhance pedestrian access to the park
- A preference for greater opportunities for off-road mountain biking within the Presidio
- Support for the use of trails in the park by dog walkers (either on- or off-leash)

- A desire for better signage, especially on the regional trails and major bike routes, and traffic calming measures for user safety and comfort
- A desire for improved access to and interpretation of historic and cultural resources, such as a historic trail through the Main Post

## **Selected Action**

The modifications to the Preferred Alternative developed in response to comments were summarized at a joint GGNRA and Presidio Trust public meeting held at the GGNRA Park Headquarters on May 20, 2003, and at a Trust public board meeting on June 17, 2003. The changes are included in this final version of the Trails Plan/EA.

## **Agency Coordination and Consultation**

NPS and Trust prepared the Trails Plan/EA concurrently with other applicable environmental reviews or consultation as required under Section 7 of the Endangered Species Act of 1973 (16 U.S.C. 1536), Section 307 of the Coastal Zone Management Act of 1972 (16 U.S.C. 1456) and the implementing Federal Regulations in 15 CFR Part 930, and Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470f). To comply with these requirements, NPS and the Trust actively solicited the participation of the U.S. Fish and Wildlife Service (USFWS), the San Francisco Bay Conservation and Development Commission (BCDC), the Advisory Council on Historic Preservation (ACHP) and the California State Historic Preservation Officer (SHPO). The views of these agencies, which have been integrated into the Trails Plan/EA, are discussed below. Copies of all relevant correspondence are available for review as part of the formal public record.

## **U.S. Fish and Wildlife Service**

On November 25, 2001, the Trust and NPS requested formal consultation with USFWS, pursuant to Section 7 of the Endangered Species Act of 1973. Prior to initiation of formal consultation, NPS and Trust representatives met and toured the Presidio with USFWS on November 6, 2000, to discuss and orient the parties to the Trails Plan/EA. The Trust and NPS again met USFWS staff on May 17, 2002, to preliminarily discuss effects of the proposed action. In the time between the initial meeting and request for formal consultation, the Trust and NPS corresponded orally and in writing with the USFWS to review and discuss the proposed plan and consultation requirements. On July 23, 2002, USFWS issued its Biological Opinion on the effects of the proposed action on the endangered Raven's manzanita, San Francisco lessingia, Presidio clarkia and the threatened Marin dwarf flax. After reviewing the current status of these plants, the environmental baseline for the action area, the effects of the proposed action and the cumulative effects, the Biological Opinion concluded that the Trails Plan/EA, as proposed, will not jeopardize the continued existence of these species or adversely affect critical habitat of these species. The Biological Opinion also noted that, "in addition to habitat restoration, the plan will benefit native plant communities, including federally listed plants, and wildlife by managing human access and redirecting access away from sensitive habitat areas."

Since issuance of the Biological Opinion by USFWS, NPS and the Trust have apprised USFWS of several changes to the Preferred Alternative in response to public comments, which have resulted in a long-term beneficial effect (e.g., a net gain of 932 square feet of proposed future habitat for the San Francisco lessingia). Due to the beneficial nature of these changes, it was determined that no further formal consultation was required.

## **San Francisco Bay Conservation and Development Commission**

Pursuant to the Coastal Zone Management Act of 1972, the BCDC is required to review Federal projects which could affect the coastal zone and determine whether the proposed action is consistent with the BCDC's Amended Coastal Zone Management Program for San Francisco Bay. On November 15, 2002, the NPS and Trust submitted a description of the proposed action and requested that the Commission concur that the Trails Plan/EA is consistent with the BCDC's Amended Coastal Zone Management Program for the San Francisco Bay segment of the California coastal zone. Based on the information contained in those materials, on February 20, 2003, the BCDC considered and found that the Trails Plan/EA is consistent with the provisions of the McAteer-Petris Act and the policies of the San Francisco Bay Plan. The BCDC's Letter of Concurrence included the following statements:

“...[I]mplementation of the plan would involve the placement of small amounts of materials and the substantial change in use of areas such that the placement, extraction, or change in use would not have a significant adverse effect on present or possible future maximum feasible public access to the Bay consistent with the project, on present or possible future use for a designated priority water-related use, and on the environment, as defined in Commission Regulation Section 10601(b)(1) and thus is equivalent to a ‘minor repair and improvement.’” In addition, San Francisco Bay Plan Map No. 4 identifies the Presidio as a park priority use area and contains a policy that states “[i]f and when not needed by Army, retain at least shoreline and undeveloped areas as regional park.” (Recreation Policy 5(a) and Bay Plan Map No. 4, Policy No. 24.) The implementation of the Presidio Trails and Bikeways Master Plan would be consistent with the Bay Plan Map notes by encouraging recreational use of the Presidio.

## **Advisory Council on Historic Preservation / California State Historic Preservation Officer**

Section 106 of the National Historic Preservation Act (NHPA) of 1966 requires NPS and the Trust to take into account the effect of their under-takings on historic and cultural resources, including the National Historic Landmark District (NHL). NPS and the Trust each entered into programmatic agreements (PA) with the ACHP and the SHPO that apply to all undertakings under their jurisdictions. The PAs provide a framework for reviewing the project effects internally and for consulting with other parties under certain circumstances.

NPS and Trust staff reviewed the Trails Plan/EA and determined that the proposed undertaking will not have an adverse effect on historic properties that contribute to the significance of NHL,

because all work will be in keeping with the Secretary of Interior's Standards for the Rehabilitation of Cultural Landscapes and Historic Properties and will conform to the Standards, Principles and Planning District Guidelines of the Presidio Trust Management Plan to the maximum extent possible. NPS and the Trust are committed to conducting additional NHPA review within their separate jurisdictions as necessary at the time individual trail segments are designed and proposed for funding. On February 24, 2003, the NPS and the Trust submitted the Trails Plan/EA to ACHP and SHPO, with a request for concurrence with this determination. NPS and the Trust supplemented this information with the record of public commentary during the public review period. On March 18, 2003, the Trust and NPS held a telephone conference with the SHPO (ACHP could not be present). Based on review of the information, SHPO staff (and later, ACHP staff) concurred with NPS and the Trust finding that there will be no adverse effect to historic properties caused by this undertaking. In a follow-up letter memorializing the course of the consultation, SHPO thanked NPS and Trust staff for "preparing an informative and responsive consultation package for this undertaking and for committing your agencies to carrying out all measures needed to secure the validity of the 'no adverse effect' finding when individual actions are implemented in accordance with the final Trails and Bikeways Plan."

## ***Finding***

Having considered the information and analyses in the *Presidio Trails and Bikeways Master Plan and Environmental Assessment*, the comments of agencies and the public, the incorporation of Best Management Practices to protect, restore and enhance the environment and the entire planning project record of NPS and the Trust, it is the determination of the National Park Service and the Presidio Trust that the Selected Action is not a major federal action having the potential to significantly affect the quality of the human environment. There are no significant direct, indirect or cumulative effects on public health or safety, threatened or endangered species, sites listed on the National Register of Historic Places or other unique characteristics of the region. No activities implementing the Selected Action will involve resource effects warranting mitigations.

Implementation of the Selected Action will not involve unique or unknown risks, cause loss or destruction of significant park resources or violate any federal, state or local law. Implementation of the Selected Action will not automatically trigger other actions that may require Environmental Impact Statements. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality (40 CFR 1508.9), an Environmental Impact Statement will not be prepared.



Recommended:

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Mai-Liis Bartling  
Acting Superintendent, Golden Gate National Recreation Area

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Date

Approved:

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Jonathan Jarvis  
Regional Director, Pacific West Region, NPS

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Date

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Craig Middleton  
Executive Director, Presidio Trust

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Date

**This is a true and correct copy  
of the final, signed version of  
the Record of Decision.  
Executed copies are available  
for review at the GGNRA Park  
Headquarters and in the  
Presidio Trust Library.**